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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

FEB 8 1990

Ref: 8RC

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Site East Helena  
File # 1.02.02.00  
Confidential: Yes ☐ No ☒  
Admin. Record: Yes ☒ No ☐  
Key Words/Comments: PRP Search:  
Followup requests for  
info from ARCO.

ENVIRONMENTAL PROTECTION  
AGENCY  
FEB 13 1990  
MONTANA OFFICE

Robert L. Dent  
Manager, Western Minerals Projects  
Anaconda Minerals Company  
555 Seventeenth Street  
Denver, Colorado 80202

Re: Information Request  
Concerning East Helena  
CERCLA Site

Dear Mr. Dent:

The United States Environmental Protection Agency, Region VIII ("EPA") has carefully reviewed your submittal of April 10, 1987 in response to the EPA's initial request for information of March 12, 1987. EPA finds the record submitted incomplete and is now seeking to obtain additional information and documents concerning the identification, nature, and quantity of materials which have been generated, treated, stored, or disposed at or transported to the East Helena plant. The purpose of this information request is to identify fully the nature and volume of the materials handled by the Anaconda Minerals Co. at the East Helena CERCLA site, the nature and extent of the release from each of the operations at the site so as to arrive at an equitable apportioning of responsibility among the Potentially Responsible Parties (the "PRPs") for the site under CERCLA.

EPA is trying to construct a data base of materials and processes pertaining to the industrial activities that took place and are taking place at the site. For the data base to be complete and accurate, EPA needs complete records of your industrial operations at East Helena. Where records do not exist or are missing you are asked to provide your best estimate. In order to assist you in preparing your response, EPA has identified a set of questions that reflect the requirements of the data base. Some questions were generated from review of your previous submittal and there may be overlaps in the information requested.

## QUESTIONS

1) Please provide a copy of "Exhibit A" referred to in Exhibit 10 of your April 10, 1987 response. Provide also a map locating your facility (i.e. buildings, furnace, kiln dryer, coolers, elevator, etc.) on the East Helena CERCLA site. The map should include the area where recycled slag was dumped.

2) The date on the Slag Treatment Flow Sheet (Exhibit 1) is not legible. Please check original and provide date.

3) The values in the "Chemical Analysis" table of Exhibit 1 are not legible. Please provide a legible table. Explain what "residue clinker" and "recycle dust" are, as used in the table.

4) Explain what "CFM" stands for as used in the "Collection System" table of Exhibit 1.

5) For each material that you generated, received, or stored (including, but not limited to raw materials, finished products, by products, waste, fuel) at the East Helena CERCLA site:

- a) Identify the generic and chemical name
- b) For each material identified, state the nature of the material (i.e., liquid, semisolid, solid, other (describe)),
- c) List the chemical constituents that make up each of the identified material, and state the average concentration and the concentration range for the constituents listed. Provide any available records of assay or analytical results.

6) Give annual data chronologically for the period from 1927 through 1972:

- a) The quantity of each material identified in response to question 5.
- b) For each material identified, the source of the supply, mode of transport, and containment method.

7) Provide shipping and sales records of zinc fume and zinc dross sold to American Chemet Corp. as per sales/purchase agreements between Anaconda and American Chemet Corp. from 1947 to 1968. (We have records for 1969-1972). If actual records aren't available for stated periods please provide estimates for that period.

8) Submit any records, if available, of annual primary and fugitive emissions from your operations. If no measurements were taken or records kept of emissions, give your best estimates for the period you had been operating.

9) The "Agreement of Lease" dated April 1, 1958 between ASARCO (the Lessor) and Anaconda (the Lessee) makes reference to the simultaneously executed "Residues and Slag Treatment Contract" between the two parties. The contract contained terms whereby Anaconda supplied ASARCO residues and lead concentrates for treatment in its zinc fuming plant. If residues and lead concentrates supplied by Anaconda were stockpiled at the site who owned the stockpile? What were the quantities stockpiled during the 1927 to 1972 period? Who owned the blast furnace slag ASARCO redelivered to Anaconda? And who owned the treated slag that Anaconda returned to the slag pile? Please provide a copy of the "Residues and Slag Treatment Contract" and other documents relevant to the handling and ownership of residues and lead concentrates and slags.

As you are aware, ASARCO Inc. entered into an Administrative Order on Consent, dated December 1988, to conduct the Remedial Investigation Feasibility Study (RI/FS) for the site. While the RI/FS for the entire site is not complete, a portion of that study (the first operable unit) has resulted in proposed remediation for the process ponds at the site. The proposed remediation resulted in a Record of Decision (ROD) issued by EPA last month, which is available for review in the Administrative Record for the site at EPA's office in East Helena as well as at the EPA Regional office in Denver. Should you like to receive a copy of the ROD, please contact D. Scott Brown at the number listed below.

During the next few months, EPA will issue Special Notice Letters, pursuant to section 122(e) of CERCLA, to the potentially responsible parties for the site to begin negotiations to implement the ROD. We encourage you to participate in those negotiations which will result in a Consent Decree between EPA and the parties that elect to participate.

Please review the questions above thoroughly and provide the information and supporting documentation requested within thirty days of the date of receipt of this letter. If you have any questions concerning this request, please contact

Sandra R. Moreno, Esq. at the Denver office (303) 293-1458, or  
D. Scott Brown at the East Helena office (406) 585-5414.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diana Shannon", with a long horizontal flourish extending to the right.

Diana Shannon, Chief  
Superfund Remedial Branch

cc: S. Moreno, 8RC  
S. Brown, 8MO  
J. Wardell, 8MO  
J. Desautels, Anaconda  
Sato, Inc.